

# EXHIBIT A

Confidential – Subject to The Protective Order  
Richard Markowitz – April 9, 2021

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1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 CASE NO. 18-MD-2865 (LAK)

4 IN RE: )  
)  
)

5 CUSTOMS AND TAX ADMINISTRATION OF )  
6 THE KINGDOM OF DENMARK )  
(SKATTEFORVALTNINGEN) TAX REFUND )  
7 SCHEME LITIGATION )  
)

8 This document relates to case nos. )  
19-cv-01783; 19-cv-01788; 19-cv-01794; )  
19-cv-01798; 19-cv-01918 )  
9 )

10  
11  
12 C O N F I D E N T I A L

13 SUBJECT TO THE PROTECTIVE ORDER  
14  
15

16 CONTINUED REMOTE VTC VIDEOTAPED DEPOSITION UNDER  
17 ORAL EXAMINATION OF  
18 RICHARD MARKOWITZ  
19 VOLUME II

20 DATE: April 9, 2021  
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22  
23  
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25 REPORTED BY: MICHAEL FRIEDMAN, CCR

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1           A     I just remember this e-mail. I  
2     don't recall being on a -- having a  
3     conversation about arbitrage instructions.

4           Q     Okay. And is the attachment to the  
5     e-mail meant to provide guidance for how  
6     Mr. Cooper and Mr. Reibeisen would do the  
7     trading for the pension plans?

8           A     How they would execute trading  
9     instructions on behalf of the plans, yes.

10          Q     Okay. At the bottom of Page 1,  
11     there are three questions that Mr. Cooper  
12     raises. And the second one is, "How do we  
13     reach POGO?"

14                Do you know who POGO is?

15          A     Yes.

16          Q     Who is that?

17          A     An employee of Solo Capital.

18          Q     Do you know his name?

19          A     I believe it's Mark Anderson,  
20     something like that. I don't have an exact  
21     recollection.

22          Q     Okay. Does Mark Paterson ring a  
23     bell?

24          A     Yes.

25          Q     Okay.

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1 A Better bell.

2 Q Okay. Do you think that's who  
3 "POGO" is?

4 A I believe so.

5 Q All right. If you turn to the next  
6 page, step one in the trading day is around  
7 7:00 a.m. to request liquidity using 34  
8 e-mails.

9 And is the 34 -- the 34 e-mails are  
10 for the 34 pension plans that were  
11 participating prior to adding six more?

12 A Yes. One request for each client.

13 Q Okay. Who was the request for  
14 liquidity supposed to be sent to?

15 A A broker.

16 Q Okay. How would Mr. Cooper or  
17 Mr. Reibeisen know which broker to reach out  
18 to for liquidity, or was that left to their  
19 discretion?

20 A Can you rephrase the question,  
21 please?

22 Q How did Mr. Cooper and  
23 Mr. Reibeisen know what broker to reach out  
24 to for liquidity?

25 A They would have received